

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CASE NO.: 15-CR-10046-LTS

UNITED STATES OF AMERICA \*

Plaintiff \*

vs. \*

MARTIN LUSTGARTEN ACHERMAN, \*

Defendant. \*

\_\_\_\_\_\*

**DEFENDANT MARTIN LUSTGARTEN ACHERMAN'S**  
**MOTION TO FILE REPLY TO GOVERNMENT'S OPPOSITION FOR**  
**RECONSIDERATION OF PRE-TRIAL DETENTION ORDER UNDER SEAL**

The Defendant, Martin Lustgarten Acherman ("Defendant"), hereby moves pursuant to Local Rule 7.2 for permission to file under seal his Reply to Government's Opposition for Reconsideration of Pre-Trial Detention Order.

The good cause stated for this motion is that the pleading sought to be sealed contains references and content of documents presently under seal with the court and also content of documents that are subject to a confidentiality agreement with the government.

Further, the Defendant states that he has no objection to, and hereby requests that, the Court remove all these documents from under seal at anytime the Court may deem appropriate and proper.

A proposed order is also included with this motion.

Dated May 29, 2015

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By: S/Nathan P. Diamond  
NATHAN P. DIAMOND, ESQUIRE

**LOCAL RULE 7.1 CERTIFICATION**

I, Nathan P. Diamond, pursuant to Rule 47 of the F. R. Crim. P., and Local Rule 7.1, hereby certifies that he has in good faith attempted to confer with counsel for the government regarding all the issues raised in this motion, but the counsel for the parties hereto have been unable to narrow or reach a resolution of these issues as presented herein.

By: S/Nathan P. Diamond  
NATHAN P. DIAMOND, ESQUIRE

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 29, 2015 I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

By: S/Nathan P. Diamond  
NATHAN P. DIAMOND, ESQUIRE